

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No: 06-0725-SI
)	CR MISC. NO.: 03-271-MMC
Plaintiff,)	
)	UNSEALING APPLICATION AND
v.)	PROPOSED ORDER
)	
TREVOR GRAHAM,)	
)	
Defendant.)	

The United States hereby moves the Court for an order unsealing the immunity orders served upon Michelle Collins and Calvin Harrison in connection with their 2003 grand jury testimony in the Balco grand jury investigation. The United States had previously requested sealing of these orders because at the time the immunity orders were signed, disclosure of the appearance of these individuals before the grand jury would have been inappropriate as a grand jury matter and would have substantially impaired the criminal investigation. As these individuals are likely to be witnesses in the upcoming prosecution of the defendant for providing false statements to federal agents, the fact that these witnesses appeared as witnesses in the Balco grand jury investigation will shortly become a matter of public record, and the government no longer has an investigative need in maintaining secrecy with respect to the appearance of these

1 witnesses before the Balco grand jury. In addition, counsel for defendant Graham has expressly
2 requested a copies of these orders as a part of his trial preparation.

3 The immunity orders for Ms. Collins and Mr. Harrison were both captioned under CR MISC.
4 NO.: 03-271. The government respectfully requests that this unsealing order pertain only to the
5 orders for Ms. Collins and Mr. Harrison, as other matters may have been lodged under this file
6 number which are not, at this time, appropriate for disclosure.

7
8 DATED: April 24, 2008

Respectfully submitted,

9 JOSEPH P. RUSSONIELLO
10 United States Attorney

11
12 /s/
JEFFREY R. FINIGAN
13 Assistant United States Attorney

14 **ORDER**

15 In light of the government's motion, and for the reasons stated therein, the immunity orders
16 for Michelle Collins and Calvin Harrison filed under criminal number CR MISC. NO.: 03-271
17 are hereby ordered unsealed. All other matters pertaining to other witnesses filed under this
18 criminal number shall remain under seal pending further order of the Court.

19
20 IT IS SO ORDERED.

21
22 DATED: _____, 2008



23
24 SUSAN ILLSTON
United States District Court Judge